

WILMINGTON RODNEY SQUARE

NEW YORK ROCKEFELLER CENTER

> Pilar G. Kraman P 302.576.3586 pkraman@ycst.com

November 11, 2020

HAND DELIVERY AND CM/ECF

The Honorable Maryellen Noreika United States District Court for the District of Delaware 844 N. King Street Wilmington, DE 19801

Re: C.A. No. 18-539-MN, Novel Drug Solutions, LLC, et al., v. Harrow Health, Inc.

Dear Judge Noreika:

Counsel in this action conferred to discuss their respective intentions relating to modification/supplementation of their damage experts in furtherance of Your Honor's recent rulings on a number of motions last week. The consensus of counsel is that the current schedule for pretrial submissions, the work related to submission of a pretrial order, the dynamic nature of the COVID-19 restrictions, and the completion of the work related to the damages experts present a difficult challenge for an orderly trial preparation.

As such, subject to the approval of the Court, the parties jointly request a postponement of the jury trial currently scheduled to begin on January 25, 2021. All counsel believe that if the schedule is extended at least 60 days, subject to the Court's availability, an agreed schedule of completion can be reasonably accomplished. The parties have availability in April, May and June 2021 for a jury trial, at which point the pandemic situation will hopefully have changed.

Counsel are available at the Court's convenience should Your Honor have any questions or wish to schedule a status conference. We appreciate the Court's consideration of this request.

Respectfully submitted,

Pilar G. Kraman (No. 5199)

cc: All counsel of record (via e-mail)